PHILIP J. TRENCHAK, ESQ. 1 Nevada State Bar No. 9924 VICTORIA C. MULLINS, ESQ. 2 Nevada State Bar No. 13546 Mullins & Trenchak, Attorneys at Law 3 1614 S. Maryland Parkway Las Vegas, Nevada 89104 P: (702) 778-9444 F: (702) 778-9449 5 E: phil@mullinstrenchak.com E: victoria@mullinstrenchak.com 6 Attorney for Plaintiff 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 CASE NO.: 2:19-cv-01695-RFB-EJY KIM BIRON, an individual, 11 Plaintiff. 12 STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION TO DISMISS 13 vs. AMENDED COMPLAINT [Dkt. 11] (First Request) 14 WYNDHAM VACATION OWNERSHIP, INC, doing business as a foreign corporation, 15 16 Defendants. 17 18 Plaintiff, KIM BIRON (hereinafter "Plaintiff"), by and through her attorney, Philip J. Trenchak, 19 Esq., of Mullins & Trenchak, Attorneys at Law and Defendant WYNDHAM VACATION OWNERSHIP. 20 INC., by and through Amy Thompson, Esq. of LITTLER MENDERSLON, P.C. do hereby stipulate to 21 22 extend the time Plaintiff has to file A Response to The Defendant's Motion to Dismiss AMENDED 23 COMPLAINT [Docket No. 11] the First Amended Complaint [Docket No. 10]. The Response is currently 24 due on January 02, 2020. The parties do hereby stipulate to an extension which would give Plaintiff up to 25 and including January 16, 2020 to file a Response to the Motion to Dismiss the Amended Complaint. 26 /// 27 28

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This Stipulation is being entered into in good faith and not for the purposes of delay. Plaintiff has requested this request to provide adequate time to properly respond given the holidays. Plaintiff's counsel also has ongoing medical issues which have necessitated this request.

## IT IS SO STIPULATED BETWEEN THE PARTIES:

DATED this 2<sup>nd</sup> day of January, 2020.

DATED this 2<sup>nd</sup> day of January, 2020.

LITTLER MENDELSON, P.C.

MULLINS & TRENCHAK, ATTORNEYS AT LAW

/s/ Amy Thompson
Amy Thompson, Esq.
Nevada State Bar No. 11907
3960 Howard Hughes Parkway Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Attorney for Defendant

/s/ Philip J. Trenchak
Philip J. Trenchak, Esq.
Nevada Bar No. 009924
1614 S. Maryland Parkway
Las Vegas, Nevada 89104
Attorneys for Plaintiff

## **ORDER**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: January 3, 2020